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5 **UNITED STATES DISTRICT COURT**  
6 **DISTRICT OF NEVADA**

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7 UNITED STATES OF AMERICA, ) No. 2:15-mj-209-CWH  
8 Plaintiff, ) **C O M P L A I N T**  
9 vs. ) 21 U.S.C. § 841(a)(1):  
10 IVERSON KELLY MICAH JOEL AHKEEM, ) Distribution of a Controlled  
a.k.a. "Rolando," ) Substance - Ethylone  
11 Defendant )

12 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
13 complainant, being duly sworn, deposes and states:

14  
15 **COUNT 1**  
**Distribution of a Controlled Substance – Ethylone**

16 Since January 2015 and continuing up to and including February 10, 2015, in the State  
17 and Federal District of Nevada, Iverson Kelly MICAH JOEL AHKEEM, a.k.a. "Rolando," the  
18 defendant, did knowingly and intentionally distribute a mixture and substance containing a  
19 detectable amount of 1-(1,3-benzodioxol-5-yl)-2-(ethylamino)propan-1-one), commonly known as  
20 Ethylone, a Schedule I controlled substance, in violation of Title 21, United States Code, §  
21 841(a)(1).

22 1. Your Affiant, Nick Gulli, as a Detective with the Las Vegas Metropolitan  
23 Police Department (LVMPD), states the following as and for probable cause:  
24

1           2. I am a Detective with the Las Vegas Metropolitan Police Department  
2 (LVMPD), currently assigned to the Narcotics section, specifically the Southern Nevada Heroin  
3 Money Laundering Task Force (SNHMLTF), and have been so employed since August 27, 1996. I  
4 am an “investigative or law enforcement officer of the United States” within the meaning of Title  
5 18, United States Code, Section 2510(7). I am also a Deputized Task Force Officer with Homeland  
6 Security Investigations (HSI) of the United States Department of Homeland Security and have been  
7 designated as a Customs Officer pursuant to 19 U.S.C. 1401(i).

8           3. I have received training which included drug identification, drug-related  
9 investigative techniques, interview and interrogation training, preparation and execution of search  
10 warrants, tactical application of drug enforcement, surveillance and electronic monitoring  
11 techniques, confidential informant management and undercover operations.

12          4. In my capacity as a Task Force Officer, I conduct investigations of the  
13 Controlled Substances Act, that is, Title 21, United States Code, Sections 841, et seq., and related  
14 offenses. I have participated in numerous drug related investigations which have involved the use  
15 of a variety of law enforcement techniques, including the use of confidential sources and  
16 undercover officers, physical surveillance, electronic surveillance, wire surveillance, pen register  
17 and telephone toll analysis, Title III intercepts, investigative interviews, the preparation and service  
18 of search and arrest warrants, reviews of taped conversations, and the review of records commonly  
19 associated with drug traffickers.

20          5. I make this statement based on my personal knowledge, interviews with law  
21 enforcement officers and information obtained throughout this investigation. I have not included  
22 every fact known to me concerning this investigation. I have set forth only those facts I believe are  
23 essential to establish the necessary foundation of probable cause for this criminal complaint. All  
24 times in this Complaint are approximate.

1           6. In January 2015, members of the SNHMLTF received information from a  
2 reliable confidential source that Iverson Kelly MICAH JOEL AHKEEM, a.k.a. "Rolando," was  
3 selling large quantities of MDMA, commonly known as Ecstasy, in the Las Vegas Valley.

4           7. During the investigation, HPD Narcotics Detective K. Slattery # 1306,  
5 working in an undercover capacity, conducted two purchases of suspected MDMA from MICAH  
6 JOEL AHKEEM. All of the undercover purchases took place in the parking lot of the Putters Bar  
7 and Grill located at 6945 S. Rainbow Boulevard, Las Vegas, Nevada.

8           8. On January 14, 2015, Detective Slattery MICAH JOEL AHKEEM in the  
9 Putters Bar and Grill parking. MICAH JOEL AHKEEM arrived in a 2005 Toyota Corolla bearing  
10 California registration 5WYK322. The Toyota Corolla is registered to Kelly Micah at 2026 N.  
11 Riverside Avenue # C136, Rialto, California. During the meeting, Detective Slattery purchased  
12 30.6 gross grams of suspected MDMA from MICAH JOEL AHKEEM for \$1,000. The suspected  
13 MDMA was submitted to the HPD Forensic Laboratory for examination and analysis. On February  
14 4, 2015, Detective Slattery received a report from the HPD Forensic Laboratory that the substance  
15 was in fact 1-(1,3-benzodioxol-5-yl)-2-(ethylamino)propan-1-one), commonly known as Ethylone,  
16 a Schedule I Controlled Substance, and had a net weight of 27.9 grams.

17           9. On January 28, 2015, Detective Slattery purchased 114.6 gross grams of  
18 suspected MDMA from MICAH JOEL AHKEEM in the Putters Bar and Grill parking lot for  
19 \$3,600. MICAH JOEL AHKEEM drove the same Toyota Corolla to the transaction. The  
20 suspected MDMA had the same appearance as the 27.9 grams of Ethylone that Detective Slattery  
21 purchased on January 14, 2015. The lab results on the 114.6 gross grams of suspected MDMA are  
22 pending.

1           10. On February 10, 2015, the investigation came to a conclusion with an  
2 undercover buy/bust operation at 6945 S. Rainbow Boulevard, Las Vegas, Nevada, where  
3 approximately 340 gross grams of suspected MDMA or Ethylone was seized.

4           11. MICHA JOEL AHKEEM drove the same Toyota Corolla to 6945 S.  
5 Rainbow, where he sold Detective Slattery approximately 340 gross grams of suspected MDMA or  
6 Ethylone for \$9,300.

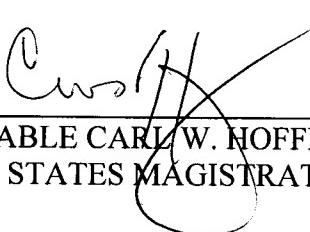
7           12. Following the transaction, members of the SNHMLTF moved in to arrest  
8 MICAH JOEL AHKEEM, but he fled on foot across Rainbow Boulevard with the suspected  
9 MDMA or Ethylone still in his possession. He was eventually apprehended and taken into custody.  
10 The 340 gross grams of suspected MDMA or Ethylone had the same appearance as the substances  
11 previously purchased by Detective Slattery. The lab results for the 340 gross grams of suspected  
12 MDMA or Ethylone are pending.

13           13. Based on my training and experience, I believe there is probable cause to  
14 believe that Iverson Kelly MICAH JOEL AHKEEM, a.k.a. "Rolando," violated Title 21, United  
15 States Code, Section 841(a)(1), Distribution of a Controlled Substance, to wit: Ethylone.

17             
18           \_\_\_\_\_  
Nick Gulli  
Task Force Officer/Detective  
Las Vegas Metropolitan Police Department

20           SUBSCRIBED and SWORN to before me

21           This 11<sup>th</sup> day of February, 2015.

22             
23           \_\_\_\_\_  
HONORABLE CARL W. HOFFMAN  
UNITED STATES MAGISTRATE JUDGE